

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MOHAMED MONASAR, GABRIELLE WALLS,  
GABRIEL ABREU, JESUS HERNANDEZ  
TORRES, LUIS MARTINEZ, BRANDON  
ROMAN, and OSAMA ALI, on behalf of himself and others  
similarly situated

**NOTICE OF CONSENT TO  
REMOVAL**

Plaintiffs, Case No.:

-against-

THE CITY OF NEW YORK, TARGET  
CORPORATION, THE NEW YORK TIMES  
COMPANY, BURLINGTON COAT FACTORY  
WAREHOUSE CORP., Bj's WHOLESALE CLUB  
INC., SAM ASH MUSIC CORPORATION, THE  
TJX COMPANIES, LLC D/B/A MARSHALLS,  
180 MAIDEN LANE, LLC , SHOP-RITE  
SUPERMARKETS, INC., and BARCLAYS BANK  
PLC AKA BARCLAYS BANK DELAWARE and  
BNOS BAIS YAAKOV OF FAR ROCKAWAY,

Defendants.

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PLEASE TAKE NOTICE that Defendant Barclays Bank PLC, by and through its  
attorneys, Epstein Becker and Green, P.C., hereby provide its written consent to remove this action  
to the United States District Court for the Southern District of New York, and specifically consents  
to the Notice of Removal filed by the City of New York in this matter.

Dated: New York, New York  
February 13, 2025

**EPSTEIN BECKER & GREEN, P.C.**  
Attorneys for Defendant Barclays Bank PLC  
By: Victoria Sloan Lin  
875 Third Avenue  
New York, NY 10022  
Phone: (212) 351-4844

By: /s/ Victoria Sloan Lin  
Victoria Sloan Lin, Esq.

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SOUTHERN DISTRICT OF NEW YORK

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SUPERMARKETS, INC., and BARCLAYS BANK  
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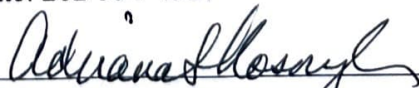
Defendants.

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PLEASE TAKE NOTICE that Defendant Burlington Coat Factory Warehouse  
Corporation, by and through its attorneys, Epstein Becker and Green, P.C., hereby provides its  
consent to remove this action to United States District Court for the Southern District of New York,  
and specifically consents to the Notice of Removal filed by the City of New York in this matter.

Dated: New York, New York  
February 13, 2025

**EPSTEIN BECKER & GREEN, P.C.**  
*Attorneys for Defendant Burlington Coat  
Factory Warehouse Corporation*  
875 Third Avenue  
New York, New York 10022  
Phone: 212-351-4527

By:

/s/   
Adriana S. Kosovych

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MOHAMED MONASAR, GABRIELLE WALLS,  
GABRIEL ABREU, JESUS HERNANDEZ  
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ROMAN, and OSAMA ALI, on behalf of himself and others  
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**NOTICE OF CONSENT TO  
REMOVAL**

Plaintiffs, Case No.:

-against-


THE CITY OF NEW YORK, TARGET  
CORPORATION, THE NEW YORK TIMES  
COMPANY, BURLINGTON COAT FACTORY  
WAREHOUSE CORP., Bj's WHOLESALE CLUB  
INC., SAM ASH MUSIC CORPORATION, THE  
TJX COMPANIES, LLC D/B/A MARSHALLS,  
180 MAIDEN LANE, LLC, SHOP-RITE  
SUPERMARKETS, INC., and BARCLAYS BANK  
PLC AKA BARCLAYS BANK DELAWARE and  
BNOS BAIS YAAKOV OF FAR ROCKAWAY,

Defendants.

----- X  
PLEASE TAKE NOTICE that Defendant Target Corporation, by and through its  
attorneys, Morgan, Lewis & Bockius, LLP, hereby provide its written consent to remove this action  
to the United States District Court for the Southern District of New York, and specifically consents  
to the Notice of Removal filed by the City of New York in this matter.

Dated: New York, New York  
February 13, 2025

**MORGAN, LEWIS & BOCKIUS LLP**

By:   
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*Attorneys for Target Corporation*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MOHAMED MONASAR, GABRIELLE WALLS,  
GABRIEL ABREU, JESUS HERNANDEZ  
TORRES, LUIS MARTINEZ, BRANDON  
ROMAN, and OSAMA ALI, all on behalf of  
themselves and others similarly situated,

Plaintiffs,

v.

CITY OF NEW YORK, TARGET  
CORPORATION, THE NEW YORK TIMES  
COMPANY, BURLINGTON COAT FACTORY  
WAREHOUSE CORP., BJ's WHOLESALE CLUB  
INC., SAM ASH MUSIC CORPORATION, THE  
TJX COMPANIES, LLC D/B/A MARSHALLS,  
180 MAIDEN LANE, LLC, SHOP-RITE  
SUPERMARKETS, INC., and BARCLAYS BANK  
PLC AKA BARCLAYS BANK DELAWARE, and  
BNOS BAIS YAAKOV OF FAR ROCKAWAY,

Defendants.

Case No.

NOTICE OF CONSENT TO REMOVAL

PLEASE TAKE NOTICE that Defendant BJ's Wholesale Club, Inc. ("BJ's"), by and through its attorneys, Hunton Andrews Kurth LLP, hereby provides its written consent to remove this action to the United States District Court for the Southern District of New York, and specifically consents to the Notice of Removal filed by the City of New York in this matter. <sup>1</sup>

DATED: February 14, 2025

Respectfully submitted,

James J. La Rocca  
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/s/ Christopher M. Pardo  
Christopher M. Pardo  
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<sup>1</sup> The Complaint improperly refers to BJ's as "Bj's Wholesale Club Inc."

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*Attorneys for Defendant*  
*BJ's Wholesale Club, Inc.*

[cpardo@hunton.com](mailto:cpardo@hunton.com)  
*Attorneys for Defendant*  
*BJ's Wholesale Club, Inc.*